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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL CAMARGO, JR.,

Defendant.

CASE NO. 2:23-CR-111-DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: April 25, 2024
TIME: 9:00 a.m.
COURT: Hon. Daniel J. Calabretta

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 25, 2024.
2. By this stipulation, defendant now moves to continue the status conference until May 23, 2024, at 9:00 a.m., and to exclude time between April 25, 2024, and May 23, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 4,761 pages of law enforcement reports, search warrant materials, financial records, and other evidence, including audio and video recordings, as well as the

1 voluminous downloaded contents of two seized cell phones. All of this discovery has been either
2 produced directly to counsel and/or made available for inspection and copying.

3 b) Counsel for defendant desires additional time to review this discovery, conduct
4 defense investigation, confer with her client regarding his options for responding to the charges,
5 and otherwise prepare for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance. In addition, counsel for the
10 government is currently in a months-long jury trial in *United States v. Yandell, et al.*, Case No.
11 2:19-cr-107-KJM. The short continuance requested by defense counsel would allow the
12 government's counsel of record to be present at the next status conference, on May 23, 2024.
13 The parties plan to appear for that status conference in person.

14 e) Based on the above-stated findings, the ends of justice served by continuing the
15 case as requested outweigh the interest of the public and the defendant in a trial within the
16 original date prescribed by the Speedy Trial Act.

17 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
18 et seq., within which trial must commence, the time period of April 25, 2024 to May 23, 2024,
19 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
20 because it results from a continuance granted by the Court at defendant's request on the basis of
21 the Court's finding that the ends of justice served by taking such action outweigh the best interest
22 of the public and the defendant in a speedy trial.

23 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
24 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
25 must commence.

26 IT IS SO STIPULATED.
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1 Dated: April 17, 2024

PHILLIP A. TALBERT
United States Attorney

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3 /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

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5 Dated: April 17, 2024

6 /s/ NOA OREN
NOA OREN
Counsel for Defendant
MIGUEL CAMARGO, JR.

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10 **ORDER**

11 IT IS SO FOUND AND ORDERED this 17th day of April, 2024

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13 /s/ Daniel J. Calabretta
14 THE HONORABLE DANIEL J. CALABRETTA
15 UNITED STATES DISTRICT JUDGE
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